

**MONTGOMERY McCRACKEN WALKER & RHOADS LLP**

(A Limited Liability Partnership Formed in Pennsylvania)

LibertyView, Suite 600

457 Haddonfield Road

Cherry Hill, New Jersey 08002

(856) 488-7700

*Counsel for Defendants Inspira Health Network, Inc.,  
Inspira Medical Centers, Inc., Joseph Alessandrini and  
Paul Abrams*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE: NEW ENGLAND  
COMPOUNDING PHARMACY, INC.  
PRODUCTS LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:  
*All New Jersey Cases*

**Document Electronically Filed**

Docket No. 1:13-md-2419-RWZ  
MDL No. 02419

**MOTION OF INSPIRA HEALTH NETWORK, INC. AND INSPIRA MEDICAL  
CENTERS, INC. FOR A PROTECTIVE ORDER PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 26(C)**

Defendants Inspira Health Network, Inc. and Inspira Medical Centers, Inc. (formerly known as South Jersey Health System, Inc. and South Jersey Hospital, Inc.) and Joseph Alessandrini and Paul Abrams (collectively, “Inspira”), hereby move this Court for entry of a protective order precluding the Premier Defendants from conducting a deposition of Inspira pursuant to Fed. R. Civ. P. 30(b)(6) and a deposition of Inspira employee, Joseph Alessandrini, R.Ph., and staying all discovery from Inspira *at this time*. In the alternative, should this Court permit the depositions, Inspira moves this Court for entry of a protective order limiting the Premier Defendants’ Fed. R. Civ. P. 30(b)(6) deposition notice because it requests discovery of irrelevant and privileged and confidential information.

Pursuant to Rule 26(c)(1) and D. Mass. Local R. 7.1, counsel for Inspira and the Premier Defendants have met and conferred and are not able to resolve the issues presented in this motion.

This Motion is supported by an accompanying Memorandum, Declaration of Stephen A. Grossman, Esq., and proposed form of Order.

Respectfully submitted,

MONTGOMERY, McCRACKEN, WALKER  
& RHOADS LLP

Dated: June 22, 2015

s/Stephen A. Grossman

Stephen A. Grossman

Louis R. Moffa, Jr.

Montgomery, McCracken, Walker & Rhoads, LLP

LibertyView, Suite 600

457 Haddonfield Road

Cherry Hill, NJ 08002

[sgrossman@mmwr.com](mailto:sgrossman@mmwr.com)

[lmoffa@mmwr.com](mailto:lmoffa@mmwr.com)

(856) 488-7700

(856) 488-7720 (facsimile)

*Counsel for Defendants*

*Inspira Health Network, Inc.,*

*Inspira Medical Centers, Inc.,*

*Joseph Alessandrini and*

*Paul Abrams*

**CERTIFICATE OF SERVICE**

I, **STEPHEN A. GROSSMAN**, hereby certify that I caused a true and correct copy of Inspira Health Network, Inc. and Inspira Medical Centers, Inc.'s Motion For A Protective Order Pursuant To Federal Rule Of Civil Procedure 26(c), accompanying Memorandum, Declaration of Stephen A. Grossman, Esq., and proposed form of Order, to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: June 22, 2015

s/ Stephen A. Grossman  
Stephen A. Grossman